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COUNSEL FOR THE DEBTORS

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:	§	CHAPTER 11
NATIONAL RIFLE ASSOCIATION OF AMERICA and SEA GIRT LLC,	§	CASE NO. 21-30085-hdh11
DEBTORS¹	§	Jointly Administered

**DEBTORS' WITNESS AND EXHIBIT LIST RELATING TO
DEBTORS' MOTION FOR AUTHORITY TO RETAIN AND PAY
LITIGATION EXPERTS TO BE HELD ON APRIL 29, 2021**

The National Rifle Association of American and Sea Girt LLC (the “Debtors”) may call the following witnesses and introduce the following exhibits in connection with *Debtors’ Motion for Authority to Retain and Pay Litigation Experts* [Docket No. 610] to be heard on April 29, 2021 at 1:30 p.m. in the above-captioned proceeding (the “Hearing”).

¹ The last four digits of the Debtors’ taxpayer identification numbers are: 6130 (NRA) and 5681 (Sea Girt). The Debtors’ mailing address is 11250 Waples Mill Road, Fairfax, Virginia 22030.

I. WITNESSES

1. The Debtor reserves the right to call the following individual as witnesses at the Hearing:
 - a. Sarah Rogers
 - b. Bill Brewer
 - c. Any witness(es) identified or called by any other parties; and
 - d. Rebuttal witnesses, as necessary.

II. EXHIBITS

2. The Debtors reserve the right to introduce the following document as an exhibit at the Hearing:

EXHIBIT NO.	DESCRIPTION
1	Experts' engagement letters [Docket No. 610-1]
2	Resumes of experts [Docket No. 610-2]
3	Schedule of amounts owed to each of the experts for post-petition, as well as the range of anticipated monthly billing by the experts through the trial [Docket No. 610-3]
4	Engagement letter of compliance expert, Charles River Associates [Docket No. 610-4]
5	Resume of Charles Peter Resnick of Charles River Associates [Docket No. 610-5]
	Any exhibit(s) offered or introduce by any other parties
	Rebuttal exhibits, as necessary

3. The Debtors reserve the right to supplement this Witness and Exhibit List.

Dated: April 27, 2021

Respectfully submitted,

/s/Patrick J. Neligan, Jr. _____

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 27th day of April 2021 a true and correct copy of the foregoing was served electronically via this Court's CM/ECF notification system.

/s/ John D. Gaither
John D. Gaither